

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

BEVERLY MICHELLE MOORE,)	
)	
Petitioner,)	
)	
v.)	Case No. CIV-09-985-G
)	
TAMIKA WHITE, Warden,)	
)	
Respondent.)	

**UNOPPOSED MOTION TO MODIFY PETITIONER'S
CONDITIONS OF RELEASE**

Petitioner respectfully requests that this Court modify her proposed condition of release relating to the GPS monitoring of her travel over the Christmas holiday.

In this Court's November 9, 2023, Order, this Court ordered that Ms. Moore submit to GPS monitoring during her travel to San Antonio over the Christmas holiday. (ECF No. 286, ¶ 10.) The travel is scheduled for December 23, 2023, through December 26, 2023.

In discussions with Probation, counsel has learned that the GPS monitoring must be turned on *prior* to being installed on Ms. Moore's ankle. There is no ability to install the device and remotely turn it on. The dates for travel and thus the dates for which monitoring is authorized are December 23,

2023. To meet Ms. Moore's travel schedule and the Court's order, the weekend duty officer for the Probation Officer would be required to meet Ms. Moore at **4:00 a.m.** on December 23, 2023, to install the ankle monitor.

Ms. Moore is proposing that this condition be modified to permit the U.S. Probation Office install the ankle monitor on December 22, 2023. She is not seeking to travel until the 23rd and consents to being monitored the additional day to avoid placing an unnecessary burden on the U.S. Probation office.

Counsel for Ms. Moore has contacted opposing counsel and they do not object to the relief sought.

Respectfully Submitted,

s/Christine Cave

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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of December 2023, I electronically transmitted the attached document to the Court Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Tessa L. Henry
Keely L. Miller
COUNSEL FOR DEFENDANT

s/Christine Cave
Christine Cave